

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b> _____
	:	
v.	:	<b>DATE FILED:</b> _____
	:	
<b>MARY VILLANUEVA</b>	:	<b>VIOLATIONS:     18 U.S.C. § 1344</b>
	:	<b>(Bank fraud - 2 counts)</b>

**INFORMATION**

**COUNT ONE**

**(Bank Fraud)**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

1.     At all times material to this information, First Union National Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation.
2.     From on or about May 24, 2000 until on or about May 26, 2000, in the Eastern District of Pennsylvania and elsewhere, defendant

**MARY VILLANUEVA**

knowingly executed and attempted to execute a scheme to defraud First Union National Bank and to obtain money, funds and credits owned by and under the custody and control of this bank by means of false and fraudulent pretenses, representations and promises.

It was a part of the scheme that:

3.     In or about April, 2000 or May, 2000, defendant MARY VILLANUEVA obtained personal identifying information concerning two individuals (identified for purposes of this

Information as “B.M.” and “S.L.”), including their names and personal bank account numbers at First Union National Bank.

4. Defendant MARY VILLANUEVA obtained false New Jersey driver’s licenses in each of the names of her victims but with her photograph on the licenses.

5. Defendant MARY VILLANUEVA obtained counterfeit checks that were made payable to each of her victims in order to deposit the checks into the FUNB accounts of her victims and then withdraw or attempt to withdraw cash from their accounts.

6. On or about the dates shown below, defendant MARY VILLANUEVA posed as “B.M.” and “S.L.,” deposited counterfeit checks into their bank accounts at FUNB, and withdrew or attempted withdraw cash in the amounts shown:

<b>Date</b>	<b>Victim’s Initials</b>	<b>Amount of Check Deposited</b>	<b>Cash Withdrawal Amount</b>	<b>FUNB branch location</b>
5/24/00	B.M.	\$2,364.53	\$2,000.00	Media, PA
5/24/00	B.M.	\$2,432.87	\$2,000.00	Springfield, PA
5/24/00	B.M.	\$2,422.93	\$2,400.00	Newtown Square, PA
5/24/00	B.M.	\$2,378.02	\$900.00	Broomall, PA
5/25/00	S.L.	\$4,241.43	\$3,000.00	Pennsburg, PA
5/25/00	S.L.	\$5,321.21	\$3,500.00	Pottstown, PA
5/25/00	S.L.	\$4,631.34	\$3,500.00	Pottstown, PA
5/26/00	S.L.	\$4,639.44	\$3,500.00	Valley Forge, PA
5/26/00	S.L.	\$3,644.09	\$3,500.00	Thorndale, PA
5/26/00	S.L.	\$2,223.79	\$3,000.00	Coatesville, PA
5/26/00	S.L.	\$3,421.13	\$3,000.00	West Chester, PA

In violation of Title 18, United States Code, Section 1344.

## **COUNT TWO**

### **(Bank Fraud)**

#### **THE UNITED STATES ATTORNEY CHARGES THAT:**

1. At all times material to this information, Summit Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation.

2. On or about June 7, 2000, in the Eastern District of Pennsylvania and elsewhere, defendant

#### **MARY VILLANUEVA**

knowingly executed and attempted to execute a scheme to defraud Summit Bank and to obtain money, funds and credits owned by and under the custody and control of this bank by means of false and fraudulent pretenses, representations and promises.

It was a part of the scheme that:

3. In or about June, 2000, defendant MARY VILLANUEVA obtained personal identifying information concerning an individual (identified for purposes of this Information as “K.S.”), including K.S.’ name and personal bank account number at Summit Bank.

4. Defendant MARY VILLANUEVA obtained a false New Jersey driver’s license in the name of her victim but with her photograph on the license.

5. Defendant MARY VILLANUEVA obtained counterfeit checks that were made payable to her victim in order to deposit the checks into her victim’s Summit Bank account and then withdraw cash from the account.

6. On or about the dates shown below, defendant MARY VILLANUEVA posed as “K.S.,” deposited counterfeit checks into the bank account of K.S. at Summit Bank, and withdrew cash in the amounts shown:

<b>Date</b>	<b>Victim's Initials</b>	<b>Amount of Check Deposited</b>	<b>Cash Withdrawal Amount</b>	<b>Summit Bank branch location</b>
6/7/00	K.S.	\$5,432.67	\$3,500.00	Fairless Hills, PA
6/7/00	K.S.	\$3,454.98	\$3,000.00	Fairless Hills, PA

In violation of Title 18, United States Code, Section 1344.

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**PATRICK L. MEEHAN**  
**United States Attorney**